

February 17, 2011

**VIA ELECTRONIC FILING**

Jocelyn Boyd, Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

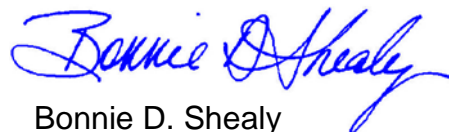
**Re: Duke Energy Carolinas - Amended Project Development Application  
Case No. 2011-20-E**

Dear Jocelyn:

Enclosed for filing please find Duke Energy Carolinas, LLC's Motion for Admission *pro hac vice* for Timika Shafeek-Horton along with the Ms. Shafeek-Horton's Verified Application for Admission *pro hac vice* which we filed with the South Carolina Supreme Court today. By copy of this letter we are serving the same on the parties of record in this proceeding. Should you have any questions, please contact me.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

  
Bonnie D. Shealy

/bds  
Enclosures

cc/enc: Jocelyn Boyd, Chief Clerk/Administrator, Public Service Commission (via email & electronic filing)  
Shannon Hudson, Esquire (via email & U.S. Mail)  
Nanette Edwards, Esquire (via email)  
Courtney Edwards, Esquire (via email)  
Timika Shafeek-Horton, Associate General Counsel (via email)  
Alex Castle, Senior Counsel (via email)

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2011-20-E**

In re:

Amended Project Development Application  
of Duke Energy Carolinas, LLC for Approval  
of Decision to Incur Nuclear Generation Pre-  
Construction Costs

**MOTION FOR ADMISSION  
*PRO HAC VICE***

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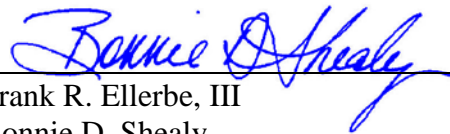
Duke Energy Carolinas, LLC (“Duke Energy Carolinas” or the “Company”) hereby moves the Public Service Commission of South Carolina (the “Commission”) to permit Timika Shafeek-Horton to practice *pro hac vice* before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Ms. Shafeek-Horton, together with counsel of record, is simultaneously filing a copy of the Verified Application for Admission *Pro Hac Vice* with the South Carolina Supreme Court. Attached is the original Verified Application.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, Duke Energy Carolinas requests this motion be granted.

Dated this 17<sup>th</sup> day of February, 2011.

Robinson McFadden, & Moore, P.C.



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Frank R. Ellerbe, III  
Bonnie D. Shealy  
1901 Main Street, Suite 1200  
Post Office Box 944  
Columbia, South Carolina 29201  
Telephone: (803)779-8900  
[fellerbe@robinsonlaw.com](mailto:fellerbe@robinsonlaw.com)  
[bshealy@robinsonlaw.com](mailto:bshealy@robinsonlaw.com)

Attorneys for Duke Energy Carolinas, LLC

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

IN THE MATTER OF:

Docket No. 2011-20-E

Amended Project Development Application of  
Duke Energy Carolinas, LLC for Approval of  
Decision to Incur Nuclear Generation  
Pre-Construction Costs

Public Service Commission of South Carolina

Mailing Address:

101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Comes now, Timika Shafeek-Horton, applicant herein, and respectfully represents the following:

1. Applicant resides at:

2430 Radrick Lane

Street Address

Charlotte

City

Mecklenburg

County

North Carolina

State

28262

Zip Code

704.503.3053

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Duke Energy Corporation

, with offices at

526 South Church Street

Street Address

Charlotte

City

Mecklenburg

County

North Carolina

State

28202

Zip Code

704.382.6373

Telephone

704-382-8137

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by Duke Energy Carolinas, LLC to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since September of 1993, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of North Carolina where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)



Court:

Supreme Court of North Carolina  
United States District Court, Western District of North Carolina  
United States District Court, Middle District of North Carolina  
4<sup>th</sup> Circuit Court of Appeals

Date Admitted:

August 1993  
May 1998  
September 1994  
March 1995

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before).

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

9. Local counsel of record associated with applicant in this case is Bonnie D. Shealy and Frank R. Ellerbe, III, of Robinson McFadden, which has offices at:

1901 Main Street, St. Suite 1200

Street Address

Columbia

City

Richland

County

South Carolina

State

29201

Zip Code

803-779.8900

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Public Service Commission Docket No. 2010-3-E, In re: Annual Review of Base Rates for Fuel Costs for Duke Energy Carolinas, LLC, case is complete. This *pro hac vice* application was filed on August 17, 2010. Bonnie Shealy of Robinson, McFadden & Moore was local counsel of record. The *pro hac vice* application was granted.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 10<sup>th</sup> day of February, 2011.

Imilia Shepley-Hatz

APPLICANT

## VERIFICATION

STATE OF North Carolina )

COUNTY OF Mecklenburg )

I, Timika Shafeek-Horton, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Timika Shafeek-Horton  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 10<sup>th</sup> day of February, 2011.

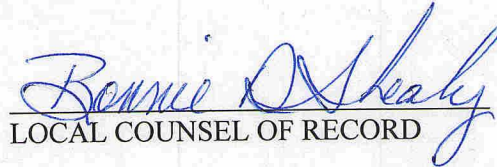
Amy E. Perry  
Notary Public for the State of North Carolina  
My Commission Expires: 11/16/2012



### LOCAL COUNSEL CONSENT

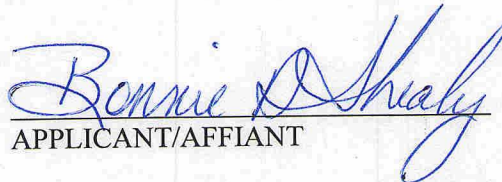
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 17 day of February, 2011.

  
LOCAL COUNSEL OF RECORD

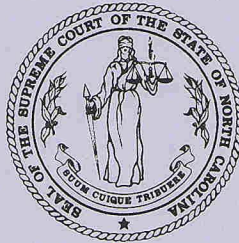
### CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 17 day of February, 2011.

  
APPLICANT/AFFIANT



# Supreme Court OF THE STATE OF NORTH CAROLINA



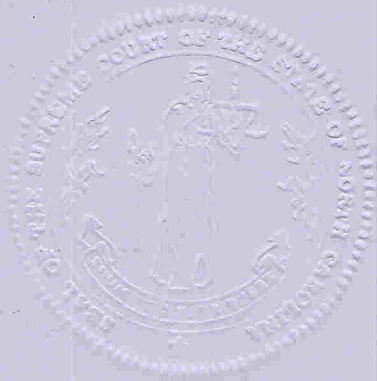
*I, Christie Speir Cameron, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 20, 1993, a license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to*

**TIMIKA SHAFEEK-HORTON**

*according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.*

*To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.*

*WITNESS my hand and the Seal of the Supreme Court of North Carolina at the office in Raleigh, this* February 11, 2011.



*Christie S. Cameron*

*Christie Speir Cameron  
Clerk of the Supreme Court  
of the State of North Carolina*

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2011-20-E**

In Re:

Amended Project Development Application of  
Duke Energy Carolinas, LLC for Approval of  
Decision to Incur Nuclear Generation Pre-  
Construction Costs

**CERTIFICATE OF SERVICE**

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Motion for Admission *pro hac vice* for Tamika Shafeek-Horton and Verified Application for Admission *pro hac vice*** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Nanette S. Edwards, Chief Counsel  
Office of Regulatory Staff  
1401 Main Street Suite 900  
Columbia, SC 29201

Shannon Hudson, Esquire  
Office of Regulatory Staff  
1401 Main Street 9th Floor  
Columbia, SC 29201

Courtney D. Edwards, Esquire  
Office of Regulatory Staff  
1401 Main Street Suite 900  
Columbia, SC 29201

Dated at Columbia, South Carolina this 17<sup>th</sup> day of February, 2011.

  
\_\_\_\_\_  
Toni C. Hawkins